

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

Chapter 11 Case

BKY Case No. 22-30753-WJF

Voyageur Imaging, LLC,

Debtor.

This Stipulation is entered into by, between, and among creditor NewLane Finance Company (“**NewLane**”) and Debtor Voyageur Imaging, LLC, (“**Debtor**”) (together, the “**Parties**”), as of September 23, 2022.

RECITALS

WHEREAS, Debtor commenced the above-captioned Chapter 11 proceeding on or about May 16, 2022; and

WHEREAS, NewLane and Debtor entered into a Settlement Agreement dated September 22, 2022 (the “**Settlement Agreement**”), wherein the Debtor agreed to make certain monthly payments to NewLane and made additional assurances to NewLane; and

NOW, THEREFORE, for valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the parties hereby stipulate and agree as follows:

1. Debtor stipulates and agrees that if it defaults under the terms of the Settlement Agreement, upon two (2) weeks written notice to the Debtor through its attorney of record, NewLane, may file an affidavit stating the default and the notice of default and NewLane shall be entitled to an order receiving stay relief.

2. **Statement Pursuant to Local Rule 9011-4(f)**. The parties below authorize the filer to submit this stipulation with the electronic signature of such party.

Dated: September 23, 2022

/e/ Kevin J. Dunlevy

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Dated: September 23, 2022

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Voyageur Imaging, LLC,

Debtor.

Pursuant to the terms of the stipulation filed by the NewLane Finance Company (“**NewLane**”) and Debtor Voyageur Imaging, LLC, (“**Debtor**”) (together, the “**Parties**”) in the above-captioned bankruptcy proceeding, the Parties agree to entry of an Order, as set forth herein.

1. The Parties entered into a Settlement Agreement dated September 22, 2022 (the “**Settlement Agreement**”), wherein the Debtor agreed to make certain monthly payments to NewLane and made additional assurances to NewLane.

2. Pursuant to the terms of the Settlement Agreement, the Parties filed a Stipulation (the “**Stipulation**”) in the above-captioned adversary proceeding on September 23, 2022.

ORDER

Pursuant to the Stipulation, IT IS HEREBY ORDERED:

1. Debtor stipulates and agrees that if it defaults under the terms of the Settlement Agreement, upon two (2) weeks written notice to the Debtor, through Debtor’s attorney of record, NewLane, may file an affidavit stating the default and notice of default and NewLane shall be entitled to an order for stay relief.

Dated:

William J. Fisher
United States Bankruptcy Judge